

IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO

2009 MAR 25 PM 2:43  
**GLORIA PARKS**

3801 East Antisdale Road  
South Euclid, Ohio 44118  
CLERK OF COURTS  
CUYAHOGA COUNTY

Plaintiff,

v.

**UNIVERSITY HOSPITALS CASE  
MEDICAL CENTER**

c/o University Hospitals of Cleveland  
Attn: General Counsel  
10524 Euclid Avenue, Suite 1100  
Cleveland, Ohio 44106

Defendant.

Case No. CV 09 681964

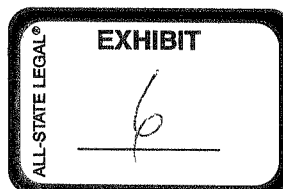
Judge Carolyn B. Friedland

PLAINTIFF'S AMENDED COMPLAINT

JURY TRIAL REQUESTED

THE PARTIES

1. Plaintiff Gloria Parks is a citizen of the State of Ohio and resides in South Euclid, Ohio, in the County of Cuyahoga.
2. Defendant University Hospitals Case Medical Center ("UHCMC") is an Ohio Corporation with its principal place of business in Cleveland, Cuyahoga County, Ohio.
3. Defendant is an "Employer" within the meaning of Ohio Revised Code Section 4112.01(A)(2) and/or is a "Person" within the meaning of Section 4112.01(A)(1) of the Ohio Revised Code.



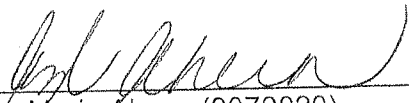
FIRST CAUSE OF ACTION

4. Plaintiff incorporates by reference Paragraphs 1-3 above as if fully realleged herein.
5. Plaintiff Gloria Parks was born on April 12, 1954, and at all times relevant hereto was over the age of forty (40).
6. Plaintiff was employed by Defendant or Defendant's predecessor starting on or around September 1978 through July 24, 2008.
7. Defendant discriminated against Plaintiff because of her age when it terminated her employment on or about July 24, 2008 and otherwise discriminated against her on the basis of her age with respect to the terms, conditions, and privileges of her employment, in violation of Ohio Revised Code Section 4112.02(A).
8. As a result of Defendant's conduct, Plaintiff has suffered and continues to suffer non-economic and economic injuries, including but not limited to pain and suffering, loss of salary, benefits, and other privileges and conditions of employment, for which Plaintiff is entitled to recover compensatory damages pursuant to Ohio Revised Code Sections 4112.99 and 4112.02(N). All or a portion of Plaintiff's damages are likely to continue indefinitely into the future.
9. Defendant's discriminatory conduct in violating Section 4112.02(A) of the Ohio Revised Code was malicious, willful, wanton, and/or in conscious disregard of Plaintiff's rights under Ohio Revised Code Chapter 4112, rendering Defendant liable for punitive damages and attorneys' fees pursuant to Section 4112.99 of the Ohio Revised Code.

WHEREFORE, Plaintiff states that she seeks an amount in excess of \$25,000.00 to fully, fairly, and justly compensate her for her injury, damage, and loss, and respectfully prays that this Court enter judgment in her favor and award her compensatory damages, consequential damages, incidental damages, punitive damages, all costs and reasonable attorneys' fees, and grant such additional or alternative relief as the Court may determine to be just and equitable.

A TRIAL BY JURY IS REQUESTED.

Respectfully submitted,

  
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

A copy of the foregoing *Amended Complaint* was served this 25<sup>th</sup> day of  
March, 2009 by ~~U.S. Mail~~ *hand delivery* upon the following:

David A. Campbell, Esq.  
Heather M. Lutz, Esq.  
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One of the Attorneys for Plaintiff